

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2004-178-E

IN THE MATTER OF:)	
)	
South Carolina Electric & Gas Company)	INTERROGATORIES OF
Application for Adjustment in the Company's)	THE CONSUMER ADVOCATE
Electric Rate Schedules and Tariffs)	(Set No. 2)
_____)	

Pursuant to S.C. Code Ann. § 37-6-601 et. seq., (2003), and 26 S.C. Code Ann. Regs. 103-851 (1976 and Supp. 2003), this party of record and Intervenor, Elliott F. Elam, Jr., Acting Consumer Advocate for the State of South Carolina, hereby serves these Interrogatories upon South Carolina Electric and Gas Company (SCE&G or Company) in Docket No. 2004-178-E and files the original and one (1) copy with George N. Dorn, Jr., Interim Executive Director of the South Carolina Public Service Commission.

IT IS HEREIN REQUESTED:

- A. That all information requested below, unless otherwise specified, be limited to the Company's South Carolina operations.
- B. That all information shall be provided to the undersigned in the format as requested.
- C. That all responses to the requests below be labeled using the same numbers as used herein.
- D. That if the requested information is found in other places or in other exhibits, reference not be made to those, but instead, that the information be reproduced and placed in the interrogatory response in the appropriate sequence.
- E. That any inquiries or communications relating to questions concerning clarifications

of the data requested below be directed to the undersigned.

- F. That all exhibits be reduced to 8½" x 11" format.
- G. That the requested information be bound in ring binders (loose leaf notebook) or otherwise bound.
- H. That in addition to the signature and verification at the close of the Company's responses, the Company witness(es) or employee(s) responsible for the information contained in each answer be indicated.
- I. That each of these Interrogatories be reproduced at the beginning of each of the responses.
- J. That the Company provide the Consumer Advocate two copies of the responses to these Interrogatories as soon as possible, but no later than **October 1, 2004**, and provide one copy to:

Glenn A. Watkins
Technical Associates, L.L.C.
1051 East Cary Street, Suite 601
Richmond, VA 23219

- K. If the response to any Interrogatory is that the information requested is not currently available, state when the information requested will be available.
 - L. These Interrogatories shall be deemed to be continuing so as to require the Company to supplement or amend its responses as any additional information becomes available.
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- 2-1. Please provide a complete copy of the Daniel F. Ford report referenced on page 31 of Dr. Malkiel's direct testimony.
 - 2-1. Please provide all workpapers and source documents to tables 2, 3, and 4 of Dr. Malkiel's direct testimony relating to:

- (a) I/B/E/S 1-T EPS growth rates (include all reports and date);
 - (b) FirstCall L-T EPS growth rates (include all reports and date);
 - (c) determination of 4.25% flotation cost.
- 2-3. It appears that Dr. Malkiel's flotation cost adjustment of 4.25% is multiplied by the DCF cost before flotation to arrive at the DCF cost after flotation. Please confirm if this is correct. If not, please explain the proper treatment of this flotation adjustment.
- 2-4. Is it Dr. Malkiel's opinion that his 4.25% flotation adjustment would be multiplied by the DCF cost (before flotation) regardless of the calculated DCF; e.g., 9.0% v. 19.0%?
- 2-5. Please explain why the I/B/E/S and FirstCall L-T EPS growth estimates are different for some companies in Dr. Malkiel's direct testimony.

Elliott F. Elam, Jr.
Acting Consumer Advocate

Hana Pokorna-Williamson
Staff Attorney

By: _____
S.C. Department of Consumer Affairs
3600 Forest Drive
Post Office Box 5757
Columbia, S.C. 29250-5757
(803) 734-4188

September 21, 2004

CERTIFICATE OF SERVICE

This is to certify that I, Hana Pokorna-Williamson on behalf of Elliott F. Elam, Jr., Acting Consumer Advocate, have served this day the foregoing **Interrogatories of the Consumer Advocate** upon the Executive Director of the Commission and the persons named below, at the addresses set forth, by personal delivery.

F. David Butler, Esquire
S.C. Public Service Commission
P.O. Drawer 11649
Columbia, SC 29211

Catherine D. Taylor, Esquire
SCANA Corporation
Legal Department
Columbia, SC 29218

Francis P. Mood, Esquire
Haynsworth Sinkler Boyd, P.A.
P.O. Box 11889
Columbia, SC 29211-1889

Frank R. Ellerbe, III, Esquire
Robinson, McFadden & Moore
P.O. Box 944
Columbia, SC 29202

Scott Elliott, Esquire
Elliott & Elliott, P.A.
721 Olive Street
Columbia, SC 29205

Dr. Kay Davoodi, P.E
Department of the Navy
Engineering Field Activity Chesapeake
Attn: Utility Rates Office
1314 Harwood Street, S.E.
Washington Navy Yard, D.C. 20374-5051

Audrey Van Dyke, Esquire
Department of the Navy
Naval Facilities Engineering Command
Litigation Headquarters
720 Kennon Street, S.E.,
BLDG 36, Room 136
Washington Navy Yard, D.C. 20374-5051

Frank Knapp, Jr.
118 East Selwood Lane
Columbia, SC 29212

Belton T. Zeigler, Esquire
P.O. Box 61136
Columbia, SC 29260

September 21, 2004
Columbia, South Carolina